



National Republican Congressional Committee

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APR 28 11 26 AM '97

April 23, 1997

Mr. John D. Gibson
Assistant Staff Director
Federal Election Commission
999 E Street, NW
Washington, DC 20436

Re: C00075820 - August Monthly Report (7/1/96-7/31/96)
C00075820 - September Monthly Report (8/1/96-8/31/96)

Dear Mr. Gibson:

Your letters referring to our April 1, 1997 responses to letters written by Jennifer Wall, raised two questions which you stated were not answered adequately.

- You have stated that the Committee should clarify disbursements itemized with the description "Meeting Expense." After reviewing CFR 104.3(b)(3), we believe that this description, which the NRCC has consistently used for at least the last ten years, does qualify as an acceptable description in the same vein as "Travel Expenses," and therefore, no further description need be provided. However, in an effort to assist your analysis of the reports, when the term "Meeting Expense" is shown on Schedule H4 it is referring to fundraising meeting expenses, and when it appears on Schedule B supporting Line 21B, it is referring to political meeting expenses.

- You have requested that the Committee provide the purpose and nature of the receipts itemized on Schedule A supporting Line 15 on the August Monthly Report (7/1/96-7/31/96) and the September Monthly Report (8/1/96-8/31/96). After reviewing CFR 104.3 (a)(4), we have found that the regulation requires the reporting committee to provide information regarding "each person who provides a rebate, refund or other offset to operating expenditures ... in an aggregate amount or value in excess of \$200.00 within the calendar year, together with the date and amount of any such receipt." Additionally, upon review of FEC Form 3X (revised 1/1/91), instructions for Line 15 read, "Enter the total amount of **offsets to operating expenditures** (including refunds, rebates, and returns of deposits) on Line 15. For each person who provides rebates, refunds or other offsets to operating expenditures aggregating in excess of \$200 for the calendar year, the committee must provide on Schedule A the identification of the person, date and amount of each receipt aggregating in excess of \$200 and the aggregate year-to-date total." There

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